

Mackay Envelope Corporation - Iowa Division  
1500 Mackay Avenue  
Mt. Pleasant, Iowa 52641  
Tel: (319) 385-9061  
EPA ID Number: IAD098721517

REC'D. IOWA SEC.

JUN 17 1994

June 8, 1994  
U.S. Environmental Protection Agency  
Region VII  
Waste Management Division

### INTRODUCTION

At the request of Lynn Slugantz, Compliance Officer in the Iowa Section, a follow up inspection was conducted at Mackay Envelope Corporation - Iowa Division on June 8, 1994. The follow up inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended. This narrative report and attachments presents the results of the inspection.

### PARTICIPANTS

Mackay Envelope Corporation - Iowa Division (Mackay)  
Mr. Ronald J. Clouse, General Manager  
Mr. Louie Tuller, Maintenance Supervisor

U.S. Environmental Protection Agency  
Mr. Richard N. McKiddy, Civil Investigator, AARP/SEE

### INSPECTION PROCEDURES

The purpose of the inspection was to follow up on an inspection conducted at the facility on August 6, 1991. A Notice of Violation (NOV) was issued to the company for failure to make hazardous waste determinations on several waste streams, failure to label, date and keep closed hazardous waste containers, failure to maintain a hazardous waste management training program, failure to have an alarm or communication device at the hazardous waste storage area and failure to have a contingency plan for hazardous waste management. Mr. Ronald J. Clouse, the General Manager, responded to the NOV on August 23, 1991. A review of the facility's letter of response by EPA determined that violations of RCRA remained unaddressed. EPA issued a Letter of Warning to the facility on September 20, 1993. Specifically, I was directed by Compliance Officer Slugantz to (1) Determine if hazardous waste determinations have been made on spent solvent-soaked rags and waste paper towels, spent filter media (from the litho press fountains), and sludge from the parts washer; (2) Determine if waste ink drums are closed, labeled and dated; (3) Examine hazardous waste management training; (4) Obtain a copy of the facility's contingency plan and determine if it has been sent to emergency response personnel; (5) Determine if the facility is keeping copies of land ban notices (check all



R00173666  
RCRA RECORDS CENTER

since May, 1993) and (6) Determine if the company is conducting weekly inspections of hazardous waste storage areas and documenting same.

On June 8, 1994, I arrived at the facility, and after making a drive-by inspection, contacted Mr. Ronald J. Clouse, the General Manager. I presented my identification to Mr. Clouse and explained that I was there to conduct a follow up inspection of the facility. I provided Mr. Clouse with the RCRA Confidentiality Notice which he signed as acknowledgement of receipt (Attachment 1). Mr. Clouse was also provided with, and allowed to read, a copy of Title 18, U. S. Code, Sections 1001 and 1002, which provide for penalties for intentionally giving false information to agents or officials of the federal government. During the inspection, we discussed the facility's processes, waste streams generated and the method of handling of those waste streams. A tour of the facility was conducted by Mr. Clouse. At the conclusion of the inspection, Mr. Clouse was provided with the Request for Confidential Treatment Form, which he signed as acknowledgement of receipt (Attachment 2). Mr. Clouse was also provided with a Receipt for Documents and Samples (Attachment 3).

#### **FACILITY DESCRIPTION**

Mackay is manufacturer of envelopes. All printing is done at customer request. The facility has operated since 1979. The company occupies a building of approximately 90,000 square feet in size in the E. A. Hayes Industrial Park in Mt. Pleasant, Iowa. The facility no longer has a post office box. The facility's address was changed to 1500 Mackay Avenue but the facility's location has not changed.

#### **FINDINGS AND OBSERVATIONS**

##### **Hazardous Waste Determinations:**

Spent solvent-soaked rags - Mr. Clouse stated that Mackay uses Aratex Services, Inc., East Moline, Illinois for cleaning of rags used to wipe down presses and clean press fountains. Mr. Clouse stated that Isopropanol mixed with water was formerly used as a fountain solution. He stated that Rosos Research Laboratories fountain solution mixed with water is now used. Mr. Clouse provided a material safety data sheet for the Rosos fountain solution (Attachment 4). Mr. Clouse stated that a hazardous waste determination was made based on knowledge of the process. He also provided a letter from Aratex Services, Inc., dated October 28, 1993, which is included with this report (Attachment 5).

Spent Solvent-soaked Paper Towels - Mr. Clouse stated that Mackay no longer uses paper towels. Formerly, paper towels were used to apply a plate cleaner (Kodak Polymatic Plate Cleaner) and a preservative (Pure Gum Arabic #2438) to the lithographic press plates. Paper towels were also used to apply a blanket

conditioner (RBP Blanket Conditioner) to the blanket of the presses. Mr. Clouse stated that rags are now used to perform these functions and the rags go to Aratex. Mr. Mackay stated that process knowledge was used to determine that the rags are nonhazardous. Material Safety Data Sheets for the products named above are attachments to the 1991 inspection report.

Spent Filter Media (from Litho press fountains) - Mr. Clouse stated that process knowledge was used to determine that the filters are nonhazardous. He stated that the ink is a water-based ink and the fountain solution (Rosos Fountain Solution) is a nonhazardous product. He stated that the filters collect small particles of the water-based ink and paper pulp. He stated that it is "mostly paper particles impregnated with water-based ink particles". The filters are disposed of to the general trash.

Sludge from the Parts Washer - Mr. Clouse stated that a non caustic/nonhazardous parts washer solution was now being used in the parts washer. Mr. Clouse stated that Power Strip 1523 is used, along with an additive - Cleaner Additive 51226 (both from Man-Gill Chemical Company). Mr. Clouse and Mr. Tuller produced material safety data sheets for the two products. The MSDS are attached (Attachment 6). The sludge is disposed to the general trash.

#### Container Storage

Drum in Storage - Messrs Clouse and Tuller showed me one 55-gallon drum in the storage area of the facility. The drum was marked (D001), closed and had a start date of April 22, 1994.

Weekly Inspection Sheet - I asked to see the weekly inspection sheet and Mr. Clouse showed me several sheets of the form used as an inspection log. It appears that Mackay has been conducting periodic inspections of the container storage area. I checked the documents for the past three months (March-May) and found that the inspections were done approximately weekly, i.e., not always done on the same day of the week.

#### Training

Mr. Clouse stated that only one person, a Mr. Garland E. (Gary) Nash, an adjuster of machines, received specific training in hazardous waste management. Mr. Clouse stated that Mr. Nash is responsible for collecting, storing and proper disposal of hazardous waste from the facility. Mr. Clouse stated that he (Clouse) trains Mr. Nash on "general handling of hazardous waste, grounding of drums, spill procedures, clean up procedures, and how to summon response people". Mr. Clouse stated that no written material was maintained on the specific training given. Mr. Clouse did produce a training completion certificate for Mr. Nash for "lockout/tagout procedures, proper handling of toxic substances and employee hazard training" dated June 2, 1993. This document appears to be directed toward satisfying OSHA

requirements for safety training.

Mr. Clouse stated that "all" employees receive training on MSDSs upon initial employment and "all" employees also receive annual refresher training. No documentation is maintained.

#### Contingency Plan

I asked Mr. Clouse for a copy of the facility's contingency plan. Mr. Clouse stated that the facility does not have a contingency plan, but does have an emergency plan. I asked to see a copy of the emergency plan, which is attached (Attachment 7). The document produced by Mr. Clouse consists of four pages. The first page, Mackay Envelope Corporation Emergency Organization Chart, is a breakdown of duties of personnel on three shifts, dated 4/93. Pages two and three (dated 6/92) briefly describes the duties of each position listed on page one. The last page is a layout of the plant and shows evacuation exits.

Mr. Clouse stated that the Mt. Pleasant Fire Department personnel are brought to the facility annually for familiarization with the facility's layout and materials on-site.

#### Manifests/Land Disposal Restriction notices (LDR)

I requested to see the facility's manifests and LDR for shipments during the past year (May, 1993 to present). The manifests show that the following shipments of hazardous waste have been made for the period indicated:

<u>Manifest #</u>	<u>Descr &amp; Quantity shipped</u>	<u>Date of shipment</u>
WIJ484680	Waste Ink F003, 2 DM (800p)	3-29-94
WIJ379925	Waste Ink F003, 2 DM (800p)	10-15-93
WIJ411352	Waste Ink F003, 3 DM (1200p)	4-13-93

All of the waste was shipped to Waste Research and Reclamation, Eau Claire, Wisconsin.

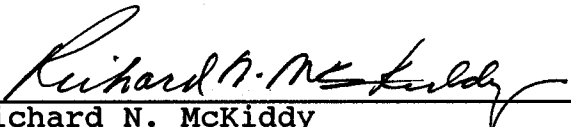
All manifests had accompanying LDRs. The manifests appeared to be correctly and completely filled out and the LDRs were properly referenced to the manifests and signed by Katherine J. Hawkins (Office Manager).

Based on the shipments, it appears that Mackay Envelope Corporation - Iowa Division may be a conditionally exempt small quantity generator at this time.

#### Photographs

Photographs were taken during the inspection and are attached (Attachment 8).

Mackay Envelope Corporation - Iowa Division

  
Richard N. McKiddy  
Civil Investigator, AARP/SEE

Date: *June 17, 1994*

Enclosures:

1. RCRA Confidentiality Notice (2 pages)
2. Receipt for Documents and Samples (1 page)
3. Request for Confidential Treatment (1 page)
4. Material Safety Data Sheet - Rosos Fountain Solution (2 pages)
5. Letter - Aratex Services, Inc. (1 page)
6. Material Safety Data Sheet - Power Strip 1523 and Cleaner Additive 51226 (6 pages)
7. Emergency Organization Chart - Mackay Env. Corp. (4 pages)
8. Photographs (4 pages)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <i>MACKAY-IOWA ENVELOPES</i>	
Facility Address <i>1560 MACKAY AVE. P.O. BOX 617, HARVEY ROAD HAYES INDUST. PARK MT. PLEASANT, IA 52641</i>	
Inspector (print) <i>RICHARD N. MCKIDDY</i>	Title <i>CIVIL INVESTIGATOR ADDRESSEE</i>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 <i>WSTM/RCRA/IOWA 726 MINNESOTA AVE 66101</i>	Date <i>JUN 8, 1994</i>

It is possible that the United States Environmental Protection Agency (EPA) will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. EPA is required to make inspection data available in response to FOIA requests, unless the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information.

To claim information confidential, you must certify that each claimed item meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within fifteen (15) calendar days of the claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). This statement should be mailed by registered, return-receipt requested mail to the Inspector at the address listed above. Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

At the completion of the inspection, you will be given a receipt for all materials collected. At that time you may make claims that some or all of the information is confidential and meets the criteria listed above.



U.S.EPA INSPECTION CONFIDENTIALITY NOTICE (cont.)

ATT 1-2

Facility Name	MACKAY-IOWA ENVELOPES
Facility Address	PO BOX 677 1500 MACKAY AVE. em HARVEY ROAD, HAYES INDUST. PARK, MT PLEASANT, IA 52641

If you are not authorized by your company and there is no one on the premises of the facility who is authorized to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the authorized representative designated below.

Authorized Representative \_\_\_\_\_

Title \_\_\_\_\_

Address \_\_\_\_\_

If the authorized representative listed above requests confidential treatment, they must return a statement specifying any information which should receive confidential treatment and written comments in support of the claim based on factors listed in 40 CFR 2.204(e)(4).

This statement from the authorized representative should be mailed by registered, return-receipt requested mail within fifteen (15) calendar days of receipt of the Confidentiality Notice to the Inspector at the address listed on page 1.

Failure to submit confidentiality claims and comments within the fifteen (15) day period will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

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To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Facility Representative Provided Notice (print)	Title
RON CLOUSE - GEN MGR.	
Signature/Date	
Ronald J. Clouse	

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name	MACKAY-IOWA ENVELOPES
Facility Address	RD BOX 617 1500 MACKAY AVE. HARVEY ROAD, HAYES INDUST. PARK, MT PLEASANT, IA 52641

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- ① MSDS - CLEANER ADDITIVE 51226 (3 PGS)
- ② MSDS - POWER STRIP 1523 (3 PGS)
- ③ MSDS - FOUNTAIN SOLUTION ROSOS RESEARCH KSP 500 (2 PGS)
- ④ EMERGENCY NOTIFICATION CHART/PROCEDURES (4 PGS)
- ⑤ PHOTOGRAPHS OF FACILITY STORAGE AREA + OUTSIDE

Facility Representative (print)	Signature/Date
RONALD J. CLOUSE	Ronald J. Clouse 4/8/94
Inspector (print)	Signature/Date
RICHARD N. MCKIDDY ADRIKSE WSTM/RCRA/IOWA	Richard N. McKiddy 6/8/94
U.S.EPA, Region VII, ENSV-Division, 25 Funston Road, Kansas City, KS 66115-66101	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REQUEST FOR CONFIDENTIAL TREATMENT

Facility Name	MACKAY-IOWA ENVELOPES
Facility Address	PO BOX 617 1506 MACKAY AVE. Rm HARVEY ROAD, HARVEY INDUST. PARK, MT PLEASANT, IA 52641

Information for which confidential treatment is requested:

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Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. The undersigned further acknowledges that they are authorized to make such claims for their firm.

The undersigned also certifies that each claimed item described above meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within 15 days of your claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

Authorized Representative (print)	Signature/Date
RONALD J. CLOUSE	Ronald J. Clouse 6/8/94
No confidential treatment claimed during the inspection: <u>ROC</u> (Facility Representative's initials)	
Inspector (print)	Signature/Date
RICHARD N. MCKIDDY, ADAPTOR	Richard N. McKiddy 6/8/94
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 WESTM/ICRA/IOWA 726 MINNESOTA AVE 6/8/94	

*Four part solution formerly used Improperly with water*

ATTACHMENT 4

# Material Safety Data Sheet

ROSOS KSP 500 AS MG

QUICK IDENTIFIER

Common Name: (used on label and list)

May be used to comply with OSHA's Hazard Communication Standard, 29CFR 1910. 1200. Standard must be consulted for specific requirements.

Health 1  
Flammability 0  
Reactivity 0

## SECTION 1 -

Personal Protection SF

Manufacturer's Name Rosos Research Laboratories, Inc.

Address 990 North Shore Drive

Emergency Telephone No. (708)295-1331

City, State, and ZIP Lake Bluff, IL 60044

Other Information Calls

Signature of Person Responsible for Preparation (Optional)

Date Prepared 1-23-91

## SECTION 2 - HAZARDOUS INGREDIENTS/IDENTITY

Hazardous Component(s) (chemical & common name(s))	OSHA PEL	ACGIH TLV	Other Exposure Limits	% (optional)	CAS NO.
Butyl Cellosolve	50 ppm	25 ppm	NONE	9%	111-76-

Subject to Section 313 Emergency Planning & Community Right-To-Know Act of 1986 (40 CFR

CARCINOGENICITY: THIS MATERIAL IS NOT CONSIDERED TO BE A CARCINOGEN BY THE NATIONAL TOXICOLOGY PROGRAM, THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER, OR THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION.

VOC: .0337 LBS. PER GALLON MIXED FOUNTAIN SOLUTION AT RECOMMENDED 5% DILUTION WITH WATER

## SECTION 3 - PHYSICAL &amp; CHEMICAL CHARACTERISTICS

Boiling Point	214°F	Specific Gravity (H <sub>2</sub> O = 1)	1.0	Vapor Pressure (mm Hg)	Not Established
		Vapor Density (Air = 1)	@ 15.5° C, 1.0704 g/cm <sup>3</sup>		
Solubility in Water	Infinitely, 100%	Reactivity in Water	N/A		
Appearance and Odor	Blue/Faint	Melting Point	N/A		

## SECTION 4 - FIRE &amp; EXPLOSION DATA

Flash Point	N/A F.	Method Used	TOC	Flammable Limits in Air % by Volume	LEL Lower	N/A	UEL Upper	N/A
Auto-Ignition Temperature	N/A	Extinguisher Media	N/A					
Special Fire Fighting Procedures	N/A							
Unusual Fire and Explosion Hazards	N/A							

*Rosos Fountain Solution - used w/ water instead of alcohol & water.*

## SECTION 5 - PHYSICAL HAZARDS (REACTIVITY DATA)

Stability Unstable ☐ Conditions  
Stable ☒ to Avoid

Freeze

NON-PHOTOCHEMICALLY REACTIVE

Incompatibility  
(Materials to Avoid)Hazardous  
Decomposition ProductsHazardous May Occur ☐ Conditions  
Polymerization Will Not Occur ☒ to Avoid

## SECTION 6 - HEALTH HAZARDS

1. Acute Mild Irritant

2. Chronic

Signs and Symptoms of Exposure Possible mild

Repeated overexposure to Butyl Cellosolve in concentrate form may cause organ damage; Risk at 0.45% of press react mix diluted with water considered minimal.

Irritation of eyes, nose, and throat

Medical Conditions Generally Aggravated by Exposure

Pre-existing dermatitis

Chemical Listed as Carcinogen or Potential Carcinogen

National Toxicology Program Yes ☐  
No ☒I.A.R.C. Monographs Yes ☐  
No ☒OSHA Yes ☐  
No ☒

Emergency and First Aid Procedures

## ROUTES OF ENTRY

1. Inhalation

Vapors may irritate nose and throat, remove to fresh air

2. Eyes

Vapors may irritate eyes, wash with water

3. Skin

Contact may cause reddening, wash with water

4. Ingestion

Induce vomiting

## SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage

Store in containers provided by manufacturer. For bulk quantities, store in lined stainless steel or reinforced plastic tanks.

Other Precautions

Steps to be Taken in Case Material is Released or Spilled

Mop or wipe up and dispose of in DOT approved waste containers.

Waste Disposal Methods (Consult federal, state, and local regulations)

Comply with all applicable government regulations.

## SECTION 8 - SPECIAL PROTECTION INFORMATION/CONTROL MEASURES

Respiratory Protection (Specify Type)

Local, Mechanical

Ventilation

Local Exhaust

Mechanical (General)

Special

Other

Protective Gloves

Rubber Gloves

Eye Protection

Protective Eyewear

Other Protective Clothing or Equipment

N/A

Work/Hygienic Practices

Eyewash, safety shower should be nearby.

IMPORTANT

If information is unavailable, unknown, or does not apply, so indicate.



SERVICES, Inc.

390 42ND AVENUE · EAST MOLINE, IL 61244 · (309) 796-1021

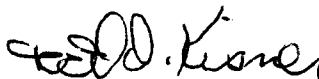
October 28, 1993

Mr. Ron Klaus  
MacKay Envelope Inc.  
Highway 218 & Harvey Road  
Mt. Pleasant, Iowa 52641

Dear Mr. Klaus:

Aratex processing procedures for print towels, as well as for all of our products, meets all requirements set forth by Illinois, Iowa and Federal EPA regulations, and all applicable OSHA Standards.

Sincerely,



Todd D. Kisner  
District Manager

dmd



**Man-GILL CHEMICAL**  
23000 ST. CLAIR AVE. • CLEVELAND, OHIO 44117 • 800-627-6422  
EMERGENCY 24 HOUR CHEMTREC NO. 800-424-9300

ATTACHMENT 6  
Ink & Solv.  
Put in e #7

## MATERIAL SAFETY DATA SHEET

### Section I

Identity: POWER STRIP 1523  
Date Prepared: 06/25/92  
Date Revised: 01/13/89  
NFPA CODE:  
HEALTH: 3 FLAMMABILITY: 2 REACTIVITY: 1

### Section II - Hazardous Ingredients

Hazardous Ingredients	SARA 313	CAS #	OSHA - PEL	ACGIH TLV-TWA	Other Hazard
POTASSIUM HYDROXIDE (CAUSTIC POTASH LIQUID)		1310-58-3	N/E	2 MG/CUM (C)	CORROSIVE
METHANOL (METHYL ALCOHOL)	Not > 20 %	67-56-1	200 PPM SKIN NIOSH - 200 PPM; ACGIH STEL - 250 PPM	200 PPM SKIN	FLAMMABLE
2-PHENOXYETHANOL	Not > 10 %	122-99-6	N/E	N/E	IRRITANT

NO COMPONENT WAS FOUND TO BE CARCINOGENIC IN NTP, IARC OR OSHA

### Section III - Physical/Chemical Characteristics

Boiling Point	180 DEG F	Specific Gravity (H2O=1)	1.19
Vapor Pressure (mm Hg)	NOT DETERMINED	Percent Volatile by Volume (%)	NOT DETERMINED
Vapor Density (AIR=Reference)	NOT DETERMINED	Evaporation Rate (ETHER=Reference)	SLOWER
Water Soluble	YES		

Appearance and Odor  
MILKY SOLUTION, CHARACTERISTIC ODOR

### Section IV - Fire and Explosion Hazard Data

Flash Point (Method Used)	Flammable Limits	LEL	UEL
120 DEG F SETA FLASH CC	NOT APPLICABLE		

Extinguishing Media CARBON DIOXIDE. DRY CHEMICAL. FOAM. ALCOHOL FOAM.

Special Fire Fighting Procedures WEAR SELF CONTAINED BREATHING APPARATUS WITH FULL FACE PIECE AND PROTECTIVE CLOTHING WHILE FIGHTING FIRES

Unusual Fire and Explosion Hazards NONE KNOWN.

### Section V - Reactivity Data

STABILITY	Unstable	Conditions to Avoid
	Stable	* NONE KNOWN

METAL PROCESSING SYSTEMS



Man-GILL CHEMICAL

ATT 6-2

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## MATERIAL SAFETY DATA SHEET

### Section V - Reactivity Data Cont.

**INCOMPATIBILITY (Materials to Avoid)**  
STRONG ACIDS

**Hazardous Decomposition Products**  
SOLVENT VAPORS

**HAZARDOUS** May Occur Conditions to Avoid  
**POLYMERIZATION** Will Not Occur \* NONE

### Section VI

**Primary Routes of Entry:** Inhalation? \* Skin? \* Ingestion?

**Effects of Overexposure** MAY CAUSE SKIN AND EYE IRRITATION AND/OR BURNS. INGESTION MAY CAUSE IRRITATION AND BURNS OF THE MUCOUS MEMBRANES, AND MAY CAUSE NAUSEA AND VOMITING. INHALATION MAY CAUSE RESPIRATORY IRRITATION AND BURNS.

**Medical Conditions Aggravated by Overexposure**  
NONE FOUND

#### Emergency and First Aid Procedures:

**Eye (Contact):** FLUSH EYES WITH COPIOUS AMOUNTS OF WATER FOR 15 MINUTES AND CONTACT PHYSICIAN IMMEDIATELY.

**Skin (Contact):** FLUSH WITH WATER FOR 15 MINUTES. CONTACT PHYSICIAN IF IRRITATION PERSISTS.

**Ingestion (Ingestion):** DO NOT INDUCE VOMITING. DRINK LARGE QUANTITIES OF WATER AND/OR MILK. CONSULT PHYSICIAN IMMEDIATELY.

**Inhalation (Breathing):** REMOVE TO FRESH AIR. AID IN BREATHING IF NECESSARY AND GET IMMEDIATE MEDICAL ATTENTION IF NEEDED.

### Section VII - Precautions for Safe Handling & Use

#### Steps to be taken in Case Material is Released or Spilled

CONTAIN SPILL AND RECOVER CLEAN MATERIAL. NEUTRALIZE WITH MILD ACID.

**Waste Disposal Method:** DISPOSE IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.

**Precautions to be Taken for Handling and Storage** STORE ABOVE FREEZING. STORE IN COOL, CLEAN, DRY LOCATION. AVOID BREATHING DUST, SPRAY OR MIST. STORE ONLY IN WELL VENTILATED AREAS. STORE AWAY FROM ACIDS.

**Other Precautions** SHOWERS AND EYE WASH FOUNTAINS SHOULD BE MADE AVAILABLE WHERE CHEMICALS ARE USED.

**METAL PROCESSING SYSTEMS**





Man-GILL CHEMICAL

ATT 6-3

23000 ST. CLAIR AVE. • CLEVELAND, OHIO 44117 • 800-627-6422

EMERGENCY 24 HOUR CHEMTREC NO. 800-424-9300

## MATERIAL SAFETY DATA SHEET

### Section VIII - Control Measures

#### Respiratory Protection (Specify Type)

USE NIOSH APPROVED EQUIPMENT WHEN AIRBORNE EXPOSURE LIMITS ARE EXCEEDED.

#### VENTILATION

Local

Mechanical RECOMMENDED TO MAINTAIN BELOW TLV

#### Protective Gloves

NEOPRENE RUBBER

#### Eye Protection

SPLASH GOGGLES OR FACE SHIELD

#### Other Protective Clothing or Equipment

PROTECTIVE CLOTHING SUFFICIENT TO PREVENT SKIN CONTACT.

#### Work/Hygienic Practices

WASH THOROUGHLY BEFORE EATING, SMOKING OR USING TOILET FACILITIES.

### Section IX - Additional Information

D.O.T. Proper Shipping Name: ALKALINE LIQUID, N.O.S.

D.O.T. Hazard Class: CORROSIVE MATERIAL

D.O.T. Identification #: NA-1719

THE INFORMATION PRESENTED HEREIN HAS BEEN COMPILED FROM SOURCES CONSIDERED TO BE DEPENDABLE AND IS ACCURATE TO THE BEST OF THE SELLER'S KNOWLEDGE; HOWEVER, THE SELLER MAKES NO WARRANTY WHATSOEVER, EXPRESSED, IMPLIED, OR OF MERCHANTABILITY REGARDING THE ACCURACY OF SUCH DATA OR THE RESULTS TO BE OBTAINED FROM THE USE THEREOF. THE SELLER ASSUMES NO RESPONSIBILITY FOR INJURY TO THE BUYER OR TO THE THIRD PARTY PERSONS OR FOR ANY DAMAGE TO ANY PROPERTY AND BUYER ASSUMES ALL SUCH RISK.

**METAL PROCESSING SYSTEMS**

**Man-GILL CHEMICAL**23000 ST. CLAIR AVE. • CLEVELAND, OHIO 44117 • 800-627-6422  
EMERGENCY 24 HOUR CHEMTREC NO. 800-424-9300ATT 6-4  
dup 208**MATERIAL SAFETY DATA SHEET****Section I**Identity  
CLEANER ADDITIVE 51226

Date Prepared 06/25/92

Date Revised 01/11/89

NFPA CODE:

HEALTH: 1 FLAMMABILITY: 1 REACTIVITY: 0

**Section II - Hazardous Ingredients**

Hazardous Ingredients	SARA 313	CAS #	OSHA - PEL	ACGIH TLV-TWA	Other Hazar
DIETHYLENE GLYCOL MONOMETHYL ETHER	Not > 35 %	111-77-3	N/E	N/E	COMBUSTIBLE

NO COMPONENT WAS FOUND TO BE CARCINOGENIC IN NTP, IARC OR OSHA

**Section III - Physical/Chemical Characteristics**

Boiling Point	381.2 DEG F	Specific Gravity (H2O=1)	0.976
Vapor Pressure (mm Hg)	LESS THAN 0.1	Percent Volatile by Volume (%)	66.0
Vapor Density (AIR=Reference)	4.8	Evaporation Rate (ETHER=Reference)	SLOWER
Water Soluble	YES		

Appearance and Odor  
COLORLESS LIQUID, MILD AND CHARACTERISTIC ODOR**Section IV - Fire and Explosion Hazard Data**

Flash Point (Method Used)	Flammable Limits	LEL	UEL
ABOVE 200 DEG F TCC	NOT APPLICABLE		

Extinguishing Media CARBON DIOXIDE. DRY CHEMICAL. FOAM. ALCOHOL FOAM.

Special Fire Fighting Procedures WEAR SELF CONTAINED BREATHING  
APPARATUS WITH FULL FACE PIECE AND PROTECTIVE CLOTHING WHILE FIGHTING FIRE!Unusual Fire and Explosion Hazards PARTIAL COMPONENT HAS RELATIVELY LOW  
AUTO IGNITION TEMP 442 DEG F.**Section V - Reactivity Data**

STABILITY	Unstable	Conditions to Avoid
	Stable	* NONE KNOWN

INCOMPATIBILITY (Materials to Avoid)

**METAL PROCESSING SYSTEMS**



## MATERIAL SAFETY DATA SHEET

### Section V - Reactivity Data Cont.

#### Hazardous Decomposition Products

BURNING CAN PRODUCE CARBON MONOXIDE AND/OR CARBON DIOXIDE.

HAZARDOUS  
POLYMERIZATION

May Occur Conditions to Avoid  
Will Not Occur \* NONE

### Section VI -

Primary Routes of Entry: Inhalation? \* Skin? \* Ingestion?

Effects of Overexposure MAY CAUSE MODERATE EYE IRRITATION AND SLIGHT SKIN IRRITATION. INGESTION MAY BE SLIGHTLY TOXIC, CAUSING DIZZINESS, HEADACHE, NAUSEA AND GASTROINTESTINAL IRRITATION. INHALATION MAY CAUSE RESPIRATORY IRRITATION. CHRONIC OVEREXPOSURE MAY CAUSE KIDNEY DAMAGE.

Medical Conditions Aggravated by Overexposure  
NONE FOUND

#### Emergency and First Aid Procedures:

Eye (Contact): FLUSH EYES WITH COPIOUS AMOUNTS OF WATER FOR 15 MINUTES AND GET MEDICAL ATTENTION IF IRRITATION PERSISTS.

Skin (Contact): FLUSH WITH WATER FOR 15 MINUTES. CONTACT PHYSICIAN IF IRRITATION PERSISTS.

Ingestion (Ingestion): DRINK LARGE QUANTITIES OF MILK OR WATER. CONSULT PHYSICIAN IMMEDIATELY.

Inhalation (Breathing): REMOVE TO FRESH AIR. AID IN BREATHING IF NECESSARY AND GET IMMEDIATE MEDICAL ATTENTION IF NEEDED.

### Section VII - Precautions for Safe Handling & Use

#### Steps to be taken in Case Material is Released or Spilled

CONTAIN SPILL AND RECOVER CLEAN MATERIAL. ABSORB AND DISPOSE WASTE.

Waste Disposal Method: DISPOSE IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.

Precautions to be Taken for Handling and Storage KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE. STORE ONLY IN WELL VENTILATED AREAS. STOCK SHOULD BE ROTATED.

Other Precautions SHOWERS AND EYE WASH FOUNTAINS SHOULD BE MADE AVAILABLE WHERE CHEMICALS ARE USED.

### Section VIII - Control Measures

Respiratory Protection (Specify Type)

METAL PROCESSING SYSTEMS





**Man-GILL CHEMICAL**

ATT 6-6

23000 ST. CLAIR AVE. • CLEVELAND, OHIO 44117 • 800-627-6422  
EMERGENCY 24 HOUR CHEMTREC NO. 800-424-9300

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### Section VIII - Control Measures Cont.

**VENTILATION** Local  
Mechanical RECOMMENDED TO MAINTAIN BELOW TLV

**Protective Gloves** NEOPRENE RUBBER  
**Eye Protection** SPLASH GOGGLES OR FACE SHIELD

**Other Protective Clothing or Equipment**  
PROTECTIVE CLOTHING SUFFICIENT TO PREVENT SKIN CONTACT.

**Work/Hygienic Practices**  
WASH THOROUGHLY BEFORE EATING, SMOKING OR USING TOILET FACILITIES.

### Section IX - Additional Information

D.O.T. Proper Shipping Name: NONE REQUIRED

D.O.T. Hazard Class: NONE REQUIRED

D.O.T. Identification #: NONE

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**METAL PROCESSING SYSTEMS**

## MACKAY ENVELOPE CORPORATION

## EMERGENCY ORGANIZATION CHART

		<u>1st Shift</u>	<u>2nd Shift</u>	<u>3rd Shift</u>
A. FIRE CHIEF	REGULAR	Eb Loescher	Hank Lessner	Joe Arl
	ALTERNATE	Jim Fus	Chuck Hunter	Terry Br
B. WEST CONTROL VALVE	REGULAR	Jack Bates	Bill A.	Jeff La
SUPERVISOR	ALTERNATE	Mike O.	Rick Brecht	Terry E
EAST CONTROL VALVE	REGULAR	Dale Steele	Scott Deaton	Gary Na
SUPERVISOR	ALTERNATE	Randy Peck	Mike L.	Bill Si
C. NOTIFY FIRE DEPT.	REGULAR	Kathy H.	Nhoung B.	Bev Bar
	ALTERNATE	Ann E.	Donna Vaughn	Fran Wa
D. HEAD COUNTER	REGULAR	Deanne M.	Donna Vaughn	Sandy S
	ALTERNATE	Joanne Corey	Diana Craig	Fran Wa
E. WEST SHUT DOWN PERSON	REGULAR	Jack Bates	Bill A.	Jeff La
	ALTERNATE	Mike O.	Rick Brecht	Terry E
EAST SHUT DOWN PERSON	REGULAR	Dale Steele	Scott Deaton	Gary Na
	ALTERNATE	Randy Peck	Mike L.	Bill Si

Effective 4/93

# Mackay Envelope Corporation

Iowa Division

## EMERGENCY ORGANIZATION 6/92

To familiarize personnel with Emergency Organization - these steps are the most important part of it and they must be covered at all times. At the first sign of fire or emergency, these people must perform as noted without delay and without waiting for further instructions.

A. FIRE CHIEF: (person in charge)

Responds to scene - directs physical fire fighting - checks on activities of the people noted below, reports situation to Mt. Pleasant Fire Chief on his arrival and coordinates with him.

B. CONTROL VALVE SUPERVISOR:

Reports directly to valve(s) controlling sprinklers in fire area. The valve(s) should be shut only on orders from person in charge or Mt. Pleasant Fire Chief. This person will continually supervise the affected system, making sure protection is restored before leaving. Also, shuts off main electrical panels, (1) in Womens restroom, (1) in Mens restroom, and (1) West Honsel area.

C. PERSON TO NOTIFY FIRE DEPT:

Someone specifically assigned to call the Fire Department (even though alarms are provided). Also meets fire trucks and directs them to fire.

D. HEAD COUNTER:

Pulls time cards for employees working and counts all heads as they clear the building. ALL PERSONNEL must meet in North parking lot. Also, if need be, move cars away from building so fire trucks can get to fire hydrants and building. All personnel are to stay together until released to leave.



## EMERGENCY ORGANIZATION 6/92

E. SHUT DOWN PERSON:

Report directly to Air Compressor and Vacuum Pumps - shut them down completely. Also shuts off Gas Valve at meter on North side of building.

NOTE: IF YOUR AREA IS ENGULFED WITH FIRE, DON'T ENDANGER YOUR LIFE.

All adjusters and operators must shut off your machine. Take notice if everyone in your area knows about the fire, and make sure everyone is able to exit building by Zone - Safely - and without delay.

YOU WILL BE TOLD ON THE INTERCOM THAT THIS IS:

...A FIRE (Begin emergency procedures)

...A FIRE DRILL

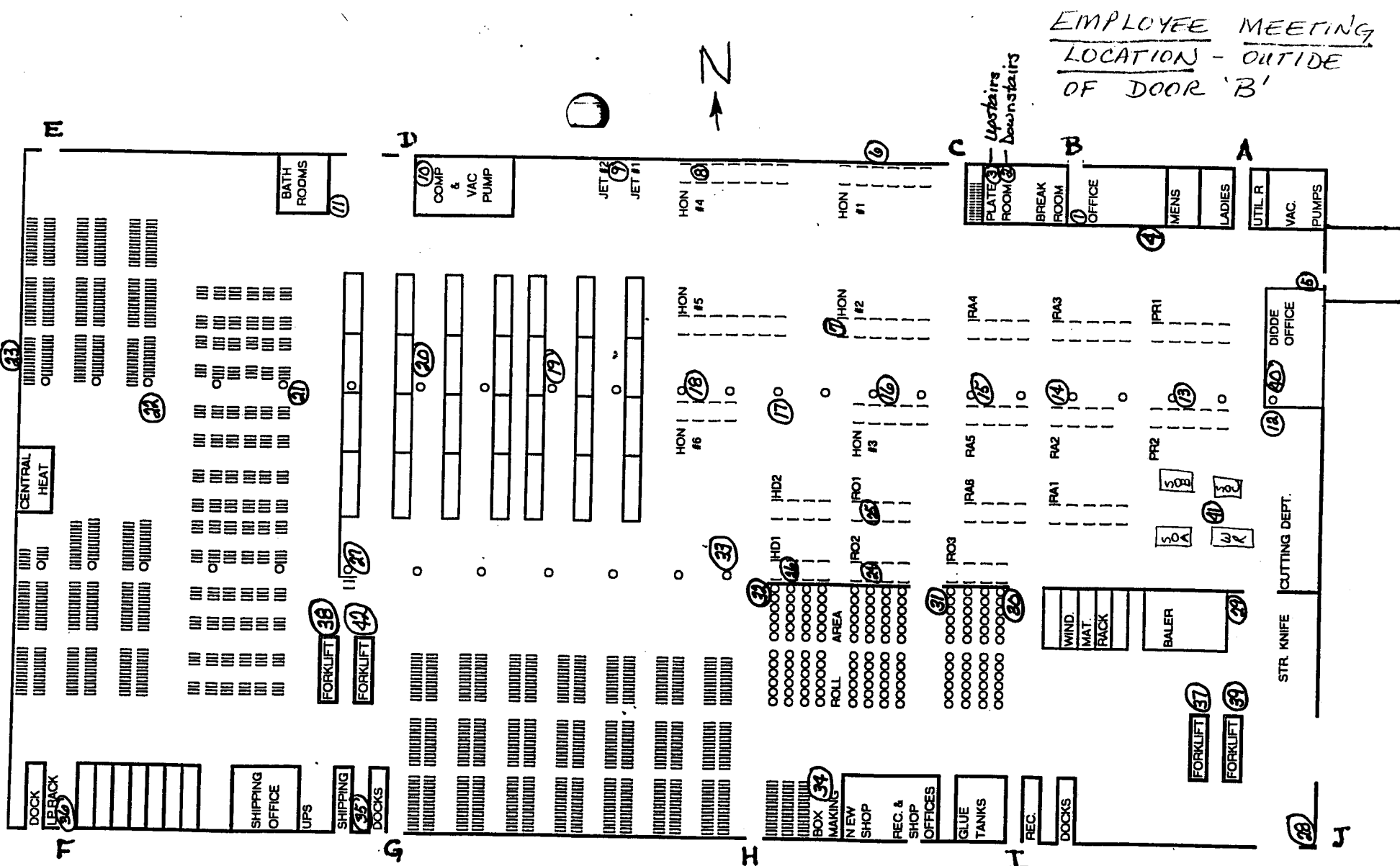
...A TEST (of the fire alarm system only)

F. Flammable Waste Spills:

Notify Plant Mgr. & Fire Department  
Announce over PA system if necessary

DO NOT ATTEMPT TO CLEAN UP BY YOURSELF - GET HELP

ATT 74



- EXIT A EMPLOYEE ENTRANCE  
 B OFFICE.  
 C AT HONSEL #1  
 D AT COMPRESSORS  
 E NORTHWEST CORNER

- F SOUTHWEST  
 G. AT SHIPPING OFFICE  
 H. SOUTH OF HD #1  
 I RECEIVING (GLUE TANKS)  
 J. SOUTH EAST CORNER



#1 →

MACKAY ENVELOPE CORP.

DRUM IN HAZARDOUS WASTE STORAGE AREA

DRUM IS CLOSED, LABELED, DATED.

#2: → MACKAY

CLOSE UP SHOT OF LABEL ON DRUM IN ABOVE PHOTO.





#3: MACKAY ENVELOPE CORPORATION  
←

EMERGENCY ALARM INSIDE  
HAZARDOUS WASTE STORAGE AREA.  
RED BUTTON ACTIVATES ALARM.

GREEN BOX ON WALL HOLDS  
INSPECTION SHEETS.



#4: MACKAY

NORTH SIDE OF  
FACILITY, LOOKING  
WEST.





↑ #5: MACKAY ENVELOPE CORPORATION.  
NORTH SIDE OF FACILITY, LOOKING EAST



↑ #6: SOUTH SIDE, LOADING DOCK, OF MACKAY  
ENVELOPE CORPORATION, LOOKING NORTH



↑ #7: MACKAY ENVELOPE CORPORATION. CLOSE UP —  
SAME VIEW AS #6, USING 105MM ZOOM LENS.



↑ #8: MACKAY. ORANGE BUILDING IS MACKAY ENVELOPE  
CORPORATION, VIEWED FROM U.S. HWY 218.  
LOOKING EAST.